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10 Counsel for **REGINALD EDWARDS**

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 UNITED STATES OF AMERICA,

2:10-cr-269-PMP-LRL

14 Plaintiff,

vs.

15 REGINALD EDWARDS,

**UNOPPOSED MOTION TO MODIFY
DATES OF TRAVEL**

16 Defendant.

17 COMES NOW, Raquel Lazo, Assistant Federal Public Defender, counsel for REGINALD
18 EDWARDS, and hereby respectfully requests that ruling issued by Magistrate Judge Foley on
19 March 14, 2011, allowing Mr. Edwards' to travel to California to attend his Grandmother's funeral
20 be modified.

21 This motion is based on the following reasons:

22 1. A hearing was held on March 14, 2011 regarding defendant's Motion to Modify (#
23 44).

24 2. Mr. Edwards was not present at the hearing as he was mistakenly in Judge Pro's
25 courtroom. Mr. Edwards did meet with counsel and his pre-trial services officer immediately
following the hearing to discuss the conditions of travel, including providing a number and address
of where he will be staying in San Bernardino.

26 3. The original proposed travel dates have changed. Mr. Edwards' family has scheduled
27 the funeral arrangements for next week. The family had difficulties gathering the family together
28 in order to have the funeral this week, therefore the plans have been delayed.

1 4. Mr. Edwards new proposed travel dates are Sunday, March 20, 2011 to Saturday,
2 March 26, 2011.

3 5. Neither government counsel or Mr. Edwards' pretrial services officer has any
4 opposition.

5 DATED this 15th day of March, 2011.

FRANNY A. FORSMAN
Federal Public Defender

/s/ *Raquel Lazo*
By _____
RAQUEL LAZO,
Assistant Federal Public Defender

IT IS SO ORDERED.

Philip M. Orr

PHILIP M. PRO, U.S. DISTRICT JUDGE

Dated: March 16, 2011.

CERTIFICATE OF ELECTRONIC SERVICE

2 The undersigned hereby certifies that I am an employee of the Law offices of the Federal
3 Public Defender for the District of Nevada and am a person of such age and discretion as to be
4 competent to serve papers.

5 That on March 15, 2011, I served an electronic copy of the above and foregoing
6 **UNOPPOSED MOTION TO MODIFY DATES OF TRAVEL** by electronic service (ECF) to
7 the persons named below:

DANIEL G. BOGDEN
United States Attorney
DREW SMITH
Assistant United States Attorney
333 Las Vegas Blvd. So., 5th Floor
Las Vegas, Nevada 89101

/s/ Karen Brokaw
Karen Brokaw, Senior Legal Secretary to
RAQUEL LAZO,
Assistant Federal Public Defender